

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIFFANY ROBINSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08 C 185
)	
H&R BLOCK, INC. and)	Honorable Judge Guzman
HSBC BANK USA, NA)	Honorable Magistrate Judge Ashman
)	
Defendant.)	
)	

**DEFENDANT H&R BLOCK, INC.'S
MOTION TO DISMISS**

Defendant, H&R Block, Inc., by and through counsel, Martin B. Carroll and Keli M. Videtto, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, moves this Court for an order dismissing the claims filed against it by plaintiff Tiffany Robinson. This Court lacks personal jurisdiction over H&R Block, Inc., because it is a holding company with absolutely no agent, office, business or other general presence in Illinois. Moreover, H&R Block, Inc. has done nothing to subject itself to the jurisdiction of this Court. In further support of this Motion, H&R Block, Inc. refers the Court to its Memorandum in Support and to the Affidavit of Bret Wilson, both of which are being filed contemporaneously with this Motion.

WHEREFORE, H&R Block, Inc. requests that the Court dismiss all of plaintiff Tiffany Robinson's claims against it, award H&R Block, Inc. its costs incurred in the defense of these claims, and grant such other and further relief as the court deems just and proper.

Respectfully submitted,

H&R BLOCK, INC.

By: /s/ Keli M. Videlto
One of Its Attorneys

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Dated: February 11, 2008

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a copy of the foregoing Motion to Dismiss was filed and served electronically to electronically with the Clerk of the Court of Illinois, Northern District, Eastern Division, 219 South Dearborn Street, Chicago, Illinois and the same being accomplished pursuant to CM/ECF this 11th day of February, 2008, on:

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